

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

<b>TERRY LYNN KING,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b><u>CAPITAL CASE</u></b>
	)	
<b>v.</b>	)	<b>Case No. 3:18-cv-01234</b>
	)	
<b>FRANK STRADA, et al.,</b>	)	<b>JUDGE CAMPBELL</b>
	)	
<b>Defendants.</b>	)	

---

<b>DONALD MIDDLEBROOKS,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b><u>CAPITAL CASE</u></b>
	)	
<b>v.</b>	)	<b>Case No. 3:19-cv-01139</b>
	)	
<b>FRANK STRADA, et al.,</b>	)	<b>JUDGE CRENSHAW</b>
	)	
<b>Defendants.</b>	)	

---

**DEFENDANTS' NOTICE OF STATUS UPDATE**

---

Pursuant to this Court's orders (*King*, D.E. 227; *Middlebrooks*, D.E. 78), Defendants hereby provide notice to the Court regarding the status of corrective actions to comply with the recommendations in the Report and Findings of the Tennessee Lethal Injection Protocol Investigation ("Report") and Governor Lee's directives. (*King*, D.E. 229-1, 229-2; *Middlebrooks*, D.E. 81-1, 81-2.)

The Tennessee Department of Correction (TDOC) has finalized a new lethal injection protocol. Defendants have notified counsel for the Plaintiffs of the completion of the new protocol, and intend to work with counsel to schedule a meeting within the next 30 days to discuss matters related to moving forward with the litigation.

Respectfully submitted,

JONATHAN SKRMETTI  
Attorney General and Reporter

/s/ Cody N. Brandon  
CODY N. BRANDON (037504)  
Managing Attorney  
Senior Assistant Attorney General

SCOTT C. SUTHERLAND (29013)  
Senior Deputy Attorney General

MIRANDA JONES (36070)  
Senior Assistant Attorney General

Law Enforcement and  
Special Prosecutions Division  
P.O. Box 20207  
Nashville, Tennessee 37202-0207  
Off. (615) 532-7400  
Fax (615) 532-4892  
[Cody.Brandon@ag.tn.gov](mailto:Cody.Brandon@ag.tn.gov)  
[Scott.Sutherland@ag.tn.gov](mailto:Scott.Sutherland@ag.tn.gov)  
[Miranda.Jones@ag.tn.gov](mailto:Miranda.Jones@ag.tn.gov)  
*Counsel for Defendants*

## CERTIFICATE OF SERVICE

I certify that on the 10th day of January, 2025, a copy of the foregoing was filed and served via the Court's CM/ECF system on the following counsel for *Middlebrooks*:

Katherine Dix  
Katheryn Thomas  
Kelley Henry  
Marshall Jensen  
Federal Public Defender's Office (MDTN)  
810 Broadway, Suite 200, Nashville, TN  
37203  
615-695-6906

[Katherine\\_Dix@fd.org](mailto:Katherine_Dix@fd.org)  
[kit\\_thomas@fd.org](mailto:kit_thomas@fd.org)  
[Kelley\\_Henry@fd.org](mailto:Kelley_Henry@fd.org)  
[Marshall\\_Jensen@fd.org](mailto:Marshall_Jensen@fd.org)

And on the following counsel for *King*:

Alex Kursman  
Lynne Leonard  
Anastassia Baldrige  
Hayden Nelson-Major  
Assistant Federal Defenders  
Federal Community Defender for the E.D.  
Penn.  
Suite 545 West, The Curtis  
601 Walnut St.  
Philadelphia, PA 19106  
(215) 928-0520  
[alex\\_kursman@fd.org](mailto:alex_kursman@fd.org)  
[lynne\\_leonard@fd.org](mailto:lynne_leonard@fd.org)  
[ana\\_baldrige@fd.org](mailto:ana_baldrige@fd.org)  
[hayden\\_nelson-major@fd.org](mailto:hayden_nelson-major@fd.org)

David Esquivel  
Sarah Miller  
Jeremy Gunn  
Michael Tackeff

Bass, Berry & Sims 150 Third Ave. South  
Nashville, TN 37201  
(615) 742-6200  
[desquivel@bassberry.com](mailto:desquivel@bassberry.com)  
[smiller@bassberry.com](mailto:smiller@bassberry.com)  
[jeremy.gunn@bassberry.com](mailto:jeremy.gunn@bassberry.com)  
[michael.tackeff@bassberry.com](mailto:michael.tackeff@bassberry.com)

Alice Haston  
Amy Rao Mohan  
Christopher C. Sabis  
Sherrard Roe Voight & Harbison, PLC  
150 Third Ave. South  
Suite 1100  
Nashville, TN 37201  
(615) 742-4539  
[ahaston@srvhlaw.com](mailto:ahaston@srvhlaw.com)  
[amohan@srvhlaw.com](mailto:amohan@srvhlaw.com)  
[csabis@srvhlaw.com](mailto:csabis@srvhlaw.com)

/s/ Cody N. Brandon  
CODY N. BRANDON  
Managing Attorney